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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

SYLVIANE DELLA WHITMORE,

Defendant.

Case No. 2:17-cr-110-APG-DJA-3

**Stipulation to Extend Deadlines
Regarding Defendant Whitmore's
Motion in Limine [ECF 129]**

It is hereby stipulated and agreed, by and between Nicholas A. Trutanich, United States Attorney, through Richard Anthony Lopez, Assistant United States Attorney, and Robert M. Draskovich, Esq., counsel for Defendant Sylviane Della Whitmore, that (1) the Government's deadline to respond to Defendant's motion in limine (filed at ECF 129), currently set for October 29, 2019, be extended to November 25, 2019; and (2) Defendant's deadline to file any reply, currently set for November 5, 2019, be extended to December 9, 2019.

This stipulation is entered into for the following reasons:

1. On October 14, 2019, Defendant Whitmore filed a motion in limine. At the time the motion was filed, trial was scheduled to begin for November 18, 2019.
2. The trial date in this case has since been continued to January 27, 2019.

1 3. The parties request an extension of the briefing schedule so that the
2 Government has adequate time to respond and so that the parties may have additional time
3 to explore a resolution that may moot the motion, thereby conserving judicial resources.

4 4. This is the first request for an extension of time regarding the briefing
5 schedule on Defendant's motion in limine.

6 5. Because trial is scheduled for January 27, 2020, the granting of this stipulation
7 will not affect the trial date.

8 6. Denial of this request for an extension could result in a miscarriage of justice.

9 DATED this 29th day of October, 2019.

10 Respectfully submitted,

11 NICHOLAS A. TRUTANICH
12 United States Attorney

13 /s/ Robert M. Draskovich, Esq.
14 ROBERT M. DRASKOVICH, ESQ.
15 Counsel for Defendant WHITMORE

16 /s/ Richard Anthony Lopez
17 RICHARD ANTHONY LOPEZ
18 Assistant United States Attorney

1 **UNITED STATES DISTRICT COURT**
2 **DISTRICT OF NEVADA**

3 UNITED STATES OF AMERICA,

Case No. 2:17-cr-110-APG-DJA-3

4 Plaintiff,

5 v.

6 SYLVIANE DELLA WHITMORE,

7 Defendant.
8

9 **Order Granting Stipulation to Extend Deadlines**

10 **Regarding Defendant's Motion in Limine**

11 Based on the pending stipulation of the parties, and good cause appearing, the
12 stipulation is hereby GRANTED.

13 IT IS HEREBY ORDERED that the deadline for the Government's response to
14 Defendant's motion in limine be extended to November 25, 2019; and

15 IT IS FURTHER ORDERED that the deadline for any reply by Defendant be
16 extended to December 9, 2019.

17 Dated: October 29, 2019.

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20 HONORABLE ANDREW P. GORDON
21 UNITED STATES DISTRICT JUDGE
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